

DAVID A. ROSENFELD, Bar No. 058163
WEINBERG, ROGER & ROSENFELD
A Professional Corporation
1001 Marina Village Parkway, Suite 200
Alameda, California 94501
Telephone (510) 337-1001
Fax (510) 337-1023
E-Mail: drosefeld@unioncounsel.net

Attorneys for the Union, INTERNATIONAL UNION OF
OPERATING ENGINEERS LOCAL 501, AFL-CIO

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
REGION 28

STATION GVR ACQUISITION, LLC D/B/A
GREEN VALLEY RANCH RESORT AND
SPA CASINO ,

And

INTERNATIONAL UNION OF OPERATING
ENGINEERS LOCAL 501, AFL-CIO,

Case 28-CA-211043

**JOINDER IN MOTION FOR
SUMMARY JUDGMENT AND
REQUEST FOR REMEDIES**

The Charging Party hereby joins in the General Counsel's Motion to Transfer to the Board and for Summary Judgment.

The Charging Party requests additional appropriate and necessary remedies:

1. Any Board Notice should be posted for the length of time between when the unfair labor practice began and when the Notice is posted;
2. The employer should be directed to provide signed copies of the Board's Notice to the Union so the Union can post the Notice;

3. The Notice should be revised to add at the top: “We have violated federal law by refusing to bargain with Operating Engineers Local 501. We have additionally refused to provide information which the Union needs to bargain. We have agreed to remedy this violation by bargaining retroactively to the date that the election was conducted. We have agreed to provide the information requested and other remedies”;

4. The employees should be afforded four hours of paid time to read and review the Board’s Order and remedy;

5. The Board’s Notice should be read by a responsible employer official in the presence of a Union representative; and

6. Copies of the Board Decision should be provided by the employer to all employees within the bargaining from the date of the election to the date of posting.

7. The Board’s decision to be mailed to all employees who worked in the unit but who are no longer employed.

For these reasons, the General Counsel’s motion should be granted promptly with the additional remedies requested by the Charging Party.

Dated: July 2, 2018

WEINBERG, ROGER & ROSENFELD
A Professional Corporation

By: /s/ David A. Rosenfeld
DAVID A. ROSENFELD

Attorneys for the Union, INTERNATIONAL UNION
OF OPERATING ENGINEERS LOCAL 501, AFL-CIO

145074\975347

PROOF OF SERVICE

I am a citizen of the United States and resident of the State of California. I am employed in the County of Alameda, State of California, in the office of a member of the bar of this Court, at whose direction this service was made. I am over the age of eighteen years and not a party to the within action.

On July 3, 2018, I served the following documents in the manner described below:

JOINDER IN MOTION FOR SUMMARY JUDGMENT AND REQUEST FOR REMEDIES

- ☒ (BY ELECTRONIC SERVICE: By electronically mailing a true and correct copy through Weinberg, Roger & Rosenfeld's electronic mail system from kkempler@unioncounsel.net to the email addresses set forth below.

Kevin Harlow, Esq.
DLA Piper LLC (US)
401 B Street, Suite 1700
San Diego, CA 92101
Kevin.harlow@dlapiper.com

Adam N. Stern, Esq.
The Myers Law Group
9327 Fairway View Place, Suite 100
Rancho Cucamonga, CA 91730
laboradam@aol.com

Harriet Lipkin, Esq.
DLA Piper LLC (US)
500 8th Street NW
Washington, DC 20004-2131
Harriet.lipkin@dlapiper.com

Elise Oviedo
National Labor Relations Board
300 S. Las Vegas Blvd. Suite 2-901
Las Vegas, NV 89101
Elise.Oviedo@nlrb.gov

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on July 3, 2018, at Alameda, California.

/s/ Karen Kempler
Karen Kempler